# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

THEODORE WILLAMS, et al.,	)
Plaintiffs,	) Case No. 1:16-cv-00266-KS-MTF
v.	) Hon. Keith Starrett
GARY HARGROVE, et al.,	) District Judge )
Defendants.	) Hon. Michael T. Parker ) Magistrate Judge
	) ) JURY TRIAL DEMANDED

## PLAINTIFFS' MOTION TO ENFORCE THE SETTLEMENT AGREEMENT REACHED IN THIS MATTER

NOW COME Plaintiffs THEODORE WILLIAMS, et al., by their undersigned attorneys, and respectfully move the Court for an Order enforcing the settlement agreement reached in this matter.

In support, Plaintiffs respectfully submit and incorporate all arguments presented in their Memorandum Brief in Support of Plaintiffs' Motion to Enforce, which is supported by the following exhibits:

Exhibit A: Report of Proceedings, Transcribing the Settlement

WHEREFORE, Plaintiffs respectfully request that the foregoing motion be granted, and that Defendants be required to adopt a written rotation policy consistent with the settlement agreement.

DATE: July 20, 2018

#### RESPECTFULLY SUBMITTED,

#### THEODORE WILLIAMS, et al.

By: /s/ David B. Owens
One of Plaintiffs' Attorneys

Attorneys for Plaintiffs
Michael Kanovitz\*
Steven Art\*
David B. Owens\*
Katherine A. Roche\*
LOEVY & LOEVY
311 N. Aberdeen St., 3rd fl.
Chicago, IL 60647
(312) 243-5900
(312) 243-5902 (fax)
steve@loevy.com
\* Admitted pro hac vice

Robert McDuff 767 N. Congress St. Jackson, MS 39202 (601) 969-0802 rbm@mcdufflaw.com Beth L. Orlansky Kiara A. Taite Mississippi Center for Justice 963 Division St. Biloxi, MS 39530 (228) 435-7248 borlansky@mscenter forjustice.org

### **CERTIFICATE OF SERVICE**

I, David B. Owens, an attorney, hereby certify that on July 20, 2018, I filed the foregoing **PLAINTIFFS' MOTION TO ENFORCE THE SETTLEMENT AGREEMENT** using the Court's CM/ECF system, which effected service on all counsel of record.

By: /s/ David B. Owens

One of Plaintiffs' Attorneys